



**OFFICE OF THE PROSECUTING ATTORNEY
JEFFREY L. ARNOLD
46TH JUDICIAL CIRCUIT
DELAWARE COUNTY, INDIANA**

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September 22, 2015

Steve Reilly
USA Today
7950 Jones Branch Drive
McLean, VA 22108

(via email at sreilly@usatoday.com)

RE: APRA Request dated September 21, 2015

Dear Mr. Reilly:

I am in receipt of your September 21, 2015 correspondence. Your email requested a copy of

The "*Brady* list," "*Giglio* list," "potential impeachment disclosure list," or any other record(s) maintained by the Delaware County Prosecutor's Office setting forth information on all peace officers in your office's jurisdiction whose involvement in a criminal proceeding must be disclosed as potentially exculpatory evidence in accordance with *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 450 U.S. 150 (1972). Where possible, please include all information on these officers as reflected in your list, including: the officer's full name, agency of employment, date of inclusion on the list, and description of the reason for inclusion on the list.

Our office does maintain a "*Giglio* list." I have attached a copy of the list pursuant to your request. Other records that could be responsive to your request were located but are being withheld pursuant to the following exceptions to Access to Public Records Act:

- Investigative records of a law enforcement agency. IC § 5-14-3-4(b)(1).
- Work product of an attorney. IC § 5-14-3-4 (b)(2).
- Deliberative material. IC § 5-14-3-4 (b)(6).

Yours truly,

Eric M. Hoffman
Chief Trial Deputy Prosecutor
46th Judicial Circuit of Indiana

Enclosure



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Giglio List

Last Name	First Name	Police Agency	Date added to the list	Reason
Fisher	Amy	Muncie Police Department	5/10/2013	Potentially committed perjury and credibility as a witness is in doubt
Miller	John	Muncie Police Department	12/5/2013	Credibility as a witness is in doubt
Bilbrey	Kristopher	Daleville PD and Walmart Security	12/5/2013	Committed and charged with theft
Hopper	George	Muncie Police Department	6/2/2014	Committed and convicted of theft
Rainey	Nathaniel	Indiana State Police	2/23/2015	Findings of trial court in Cause No. 81C01-1402-FB-39